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20 Attorneys for Cross-Claim Defendant  
21 IRONSHORE SPECIALTY INSURANCE COMPANY

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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

ILLINOIS UNION INSURANCE  
COMPANY, an Illinois corporation

Case No.: 3:13-cv-04863-JST  
Case No.: 3:13-cv-005801-JST

Plaintiff,

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND TIME TO  
RESPOND TO PLAINTIFF'S  
COMPLAINT**

v.

INTUITIVE SURGICAL, INC., a Delaware  
corporation,

Judge: Honorable J. Tigar

Defendant.

NAVIGATORS SPECIALTY INSURANCE  
COMPANY, a Delaware corporation

Plaintiff,

v.

1 INTUITIVE SURGICAL, INC., a Delaware  
2 corporation,

3 Defendant.

5 INTUITIVE SURGICAL, INC., a Delaware  
6 Corporation,

7 Cross-Complainant,

8 v.

9 IRONSHORE SPECIALTY INSURANCE  
10 CO., an Arizona corporation,

11 Cross Defendant.

12  
13 WHEREAS, defendant Intuitive Surgical, Inc. (“Intuitive”) filed its Cross-Complaint in this  
14 action against defendant Ironshore Specialty Insurance Co. (“Ironshore”) on March 3, 2015;

15 WHEREAS, on March 19, 2015, the parties stipulated to an extension of the time for  
16 Ironshore to answer, plead or otherwise move in response to the Cross-Complaint until April 10,  
17 2015 (Doc. 62);

18 WHEREAS, Ironshore has requested a further extension of two business days, to April 14,  
19 2015, to accommodate scheduling conflicts;

20 WHEREAS, on this 10<sup>th</sup> day of April 2015, Intuitive agreed to Ironshore’s request for a  
21 extension of time through and including April 14, 2015 to respond or otherwise plead to the Cross-  
22 Complaint;

23 WHEREAS, the requested extension will not affect any other deadlines in the case;

24 Accordingly, IT IS HEREBY STIPULATED AND AGREED between the Intuitive and  
25 Ironshore, pursuant to Civ. L. R. 6-2(a) that Ironshore shall have an extension of time, through and  
26 including April 14, 2015, within which to respond to the Cross-Complaint filed by Intuitive.

Dated: April 10, 2015

# HANGLEY ARONCHICK SEGAL PUDLIN & SCHILLER

By: /s/Sharon F. McKee  
Ronald P. Schiller  
Sharon F. McKee  
Jacqueline R. Dungey

## LAFAYETTE & KUMAGAI LLP

By: /s/Gary T. Lafayette  
Gary T. Lafayette  
April P. Santos

Attorneys for Cross-Claim Defendant  
**IRONSHORE SPECIALTY INSURANCE  
COMPANY**

Dated: April 10, 2015

SKADDEN, ARPS, SLATE, MEAGHER &  
FLOM LLP

By: /s/Peter Luneau

Peter Luneau  
Thomas E. Haroldson  
Raoul Kennedy

Attorneys for Cross-Claim Plaintiff  
INTUITIVE SURGICAL, INC.

## SIGNATURE ATTESTATION

I hereby attest that I have obtained the concurrence of Peter Luneau, counsel for Cross-Complainant, for the filing of this stipulation.

/s/ Sharon F. McKee  
SHARON F. MC KEE

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

Dated: April 10, 2015

Honorable Jon S. Tiger  
United States District Court Judge

**STIPULATION AND [PROPOSED] ORDER  
TO EXTEND TIME TO RESPOND TO PLAINTIFF'S CROSS-COMPLAINT**  
Case No.: 3:13-cv-04863 JST; 3:13-cv-05801 JST